

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

:

JUDGE BUCHWALD

- v. -

:

INDICTMENT

SIRON STAFFORD,
a/k/a "Sherm,"

:

19 Cr. ____

Defendant.

:

19 CRIM 377

- - - - - X

COUNT ONE
(Narcotics Conspiracy)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: MAY 22 2019
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The Grand Jury charges:

1. From at least on or about November 7, 2018, up to and including at least on or about April 9, 2019, in the Southern District of New York and elsewhere, SIRON STAFFORD, a/k/a "Sherm," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that SIRON STAFFORD, a/k/a "Sherm," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that SIRON STAFFORD, a/k/a "Sherm," the defendant, conspired to distribute and possess with intent to distribute were (i) 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B); (ii) 40 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(B); and (iii) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, SIRON STAFFORD a/k/a "Sherm," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value; or

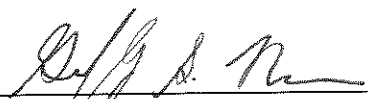
e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendant up to the value of the above
forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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a/k/a "Sherm,"

Defendant.

INDICTMENT

19 Cr.

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney.


A TRUE BILL

Foreperson.

May 22, 2019

Filed Indictment. Case assigned to Judge Buchwald.

U.S.M.J. Debra Freeman